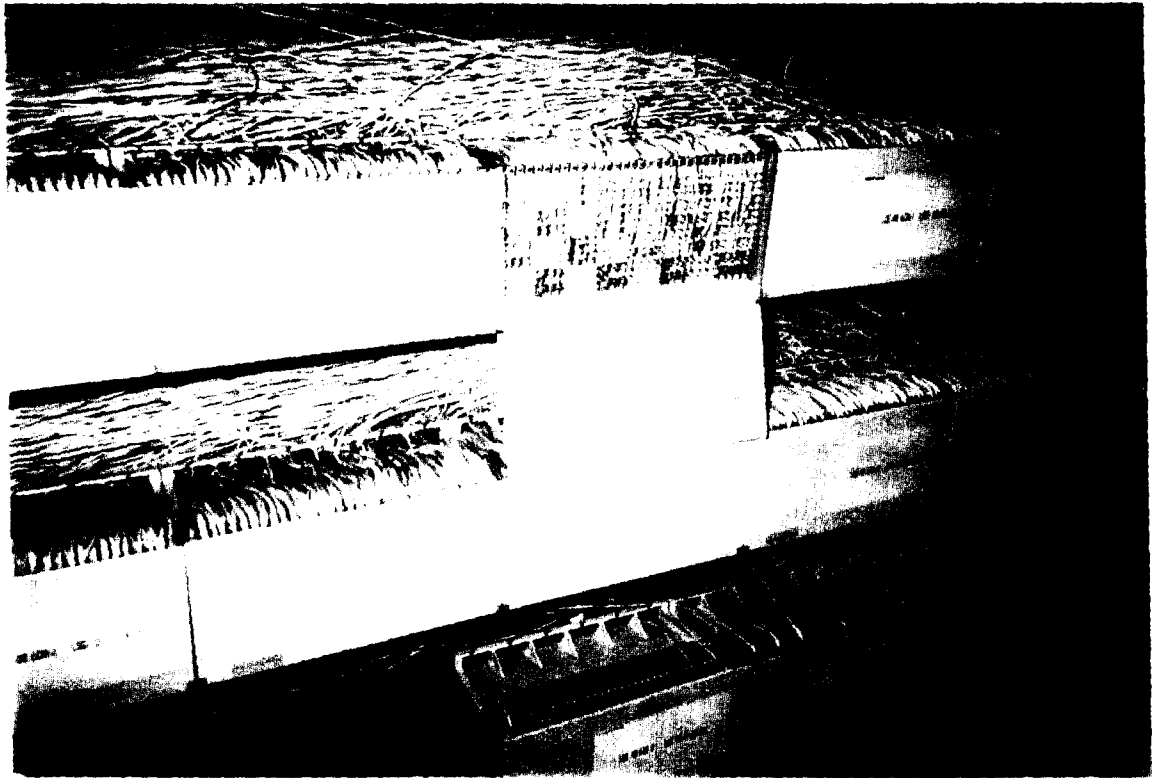
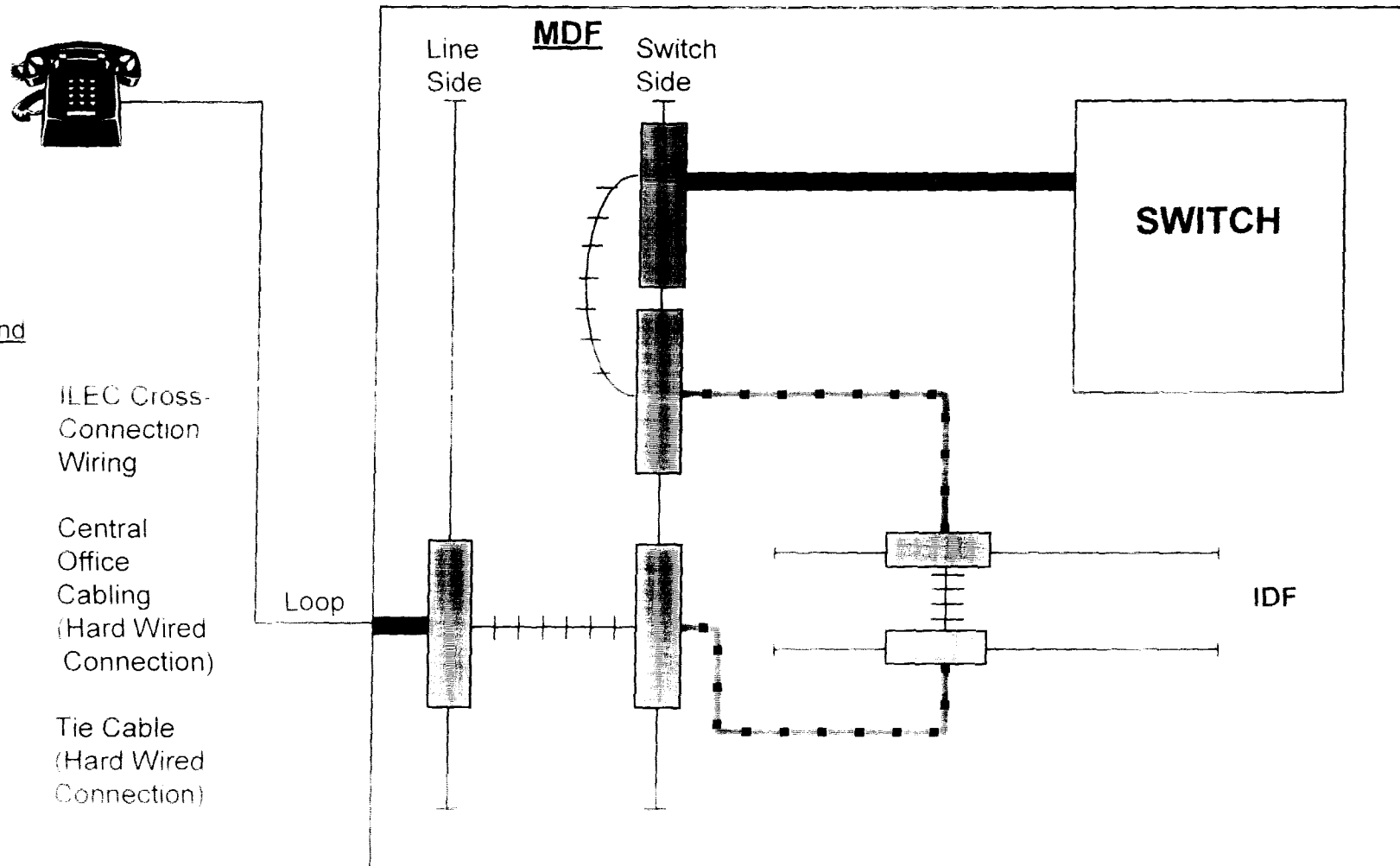


# **ATTACHMENT 4**



# **ATTACHMENT 5**

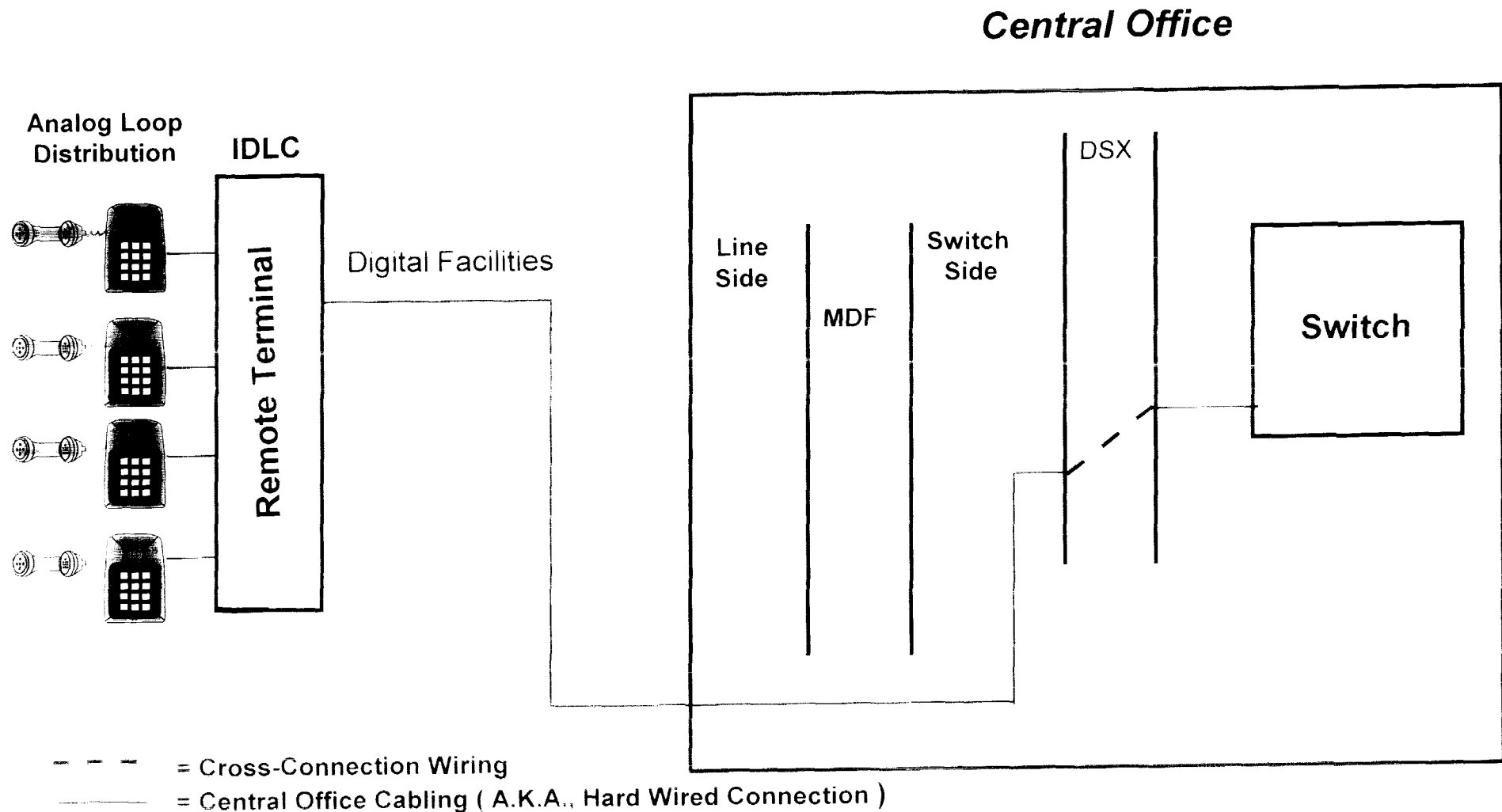
**Figure 2**  
**ILEC Loop And Switch Port Configuration**  
**(With IDF)**



# **ATTACHMENT 6**

# Figure 3:

## Typical IDLC Loop And Switch Port Configuration



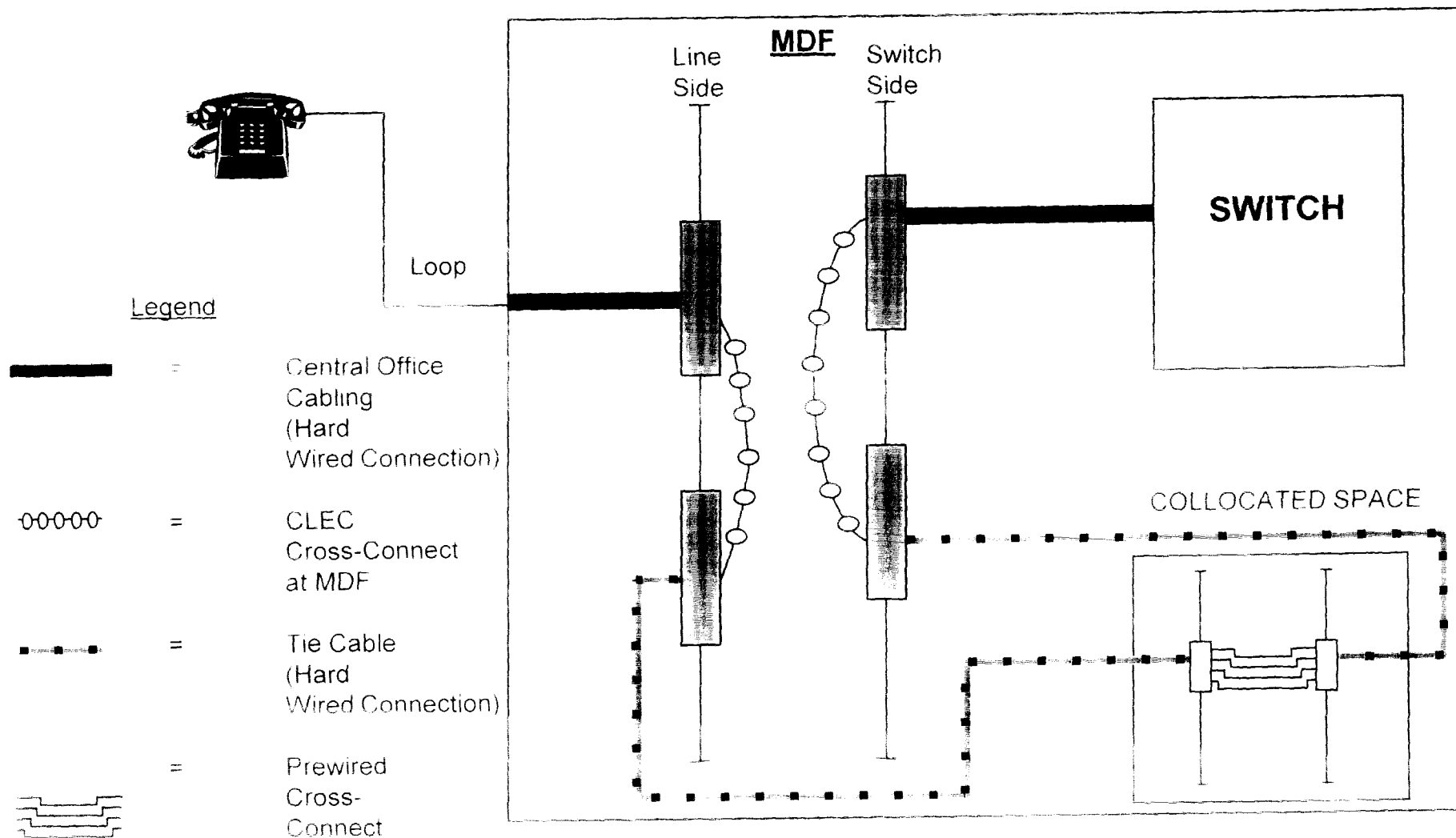
# **ATTACHMENT 7**





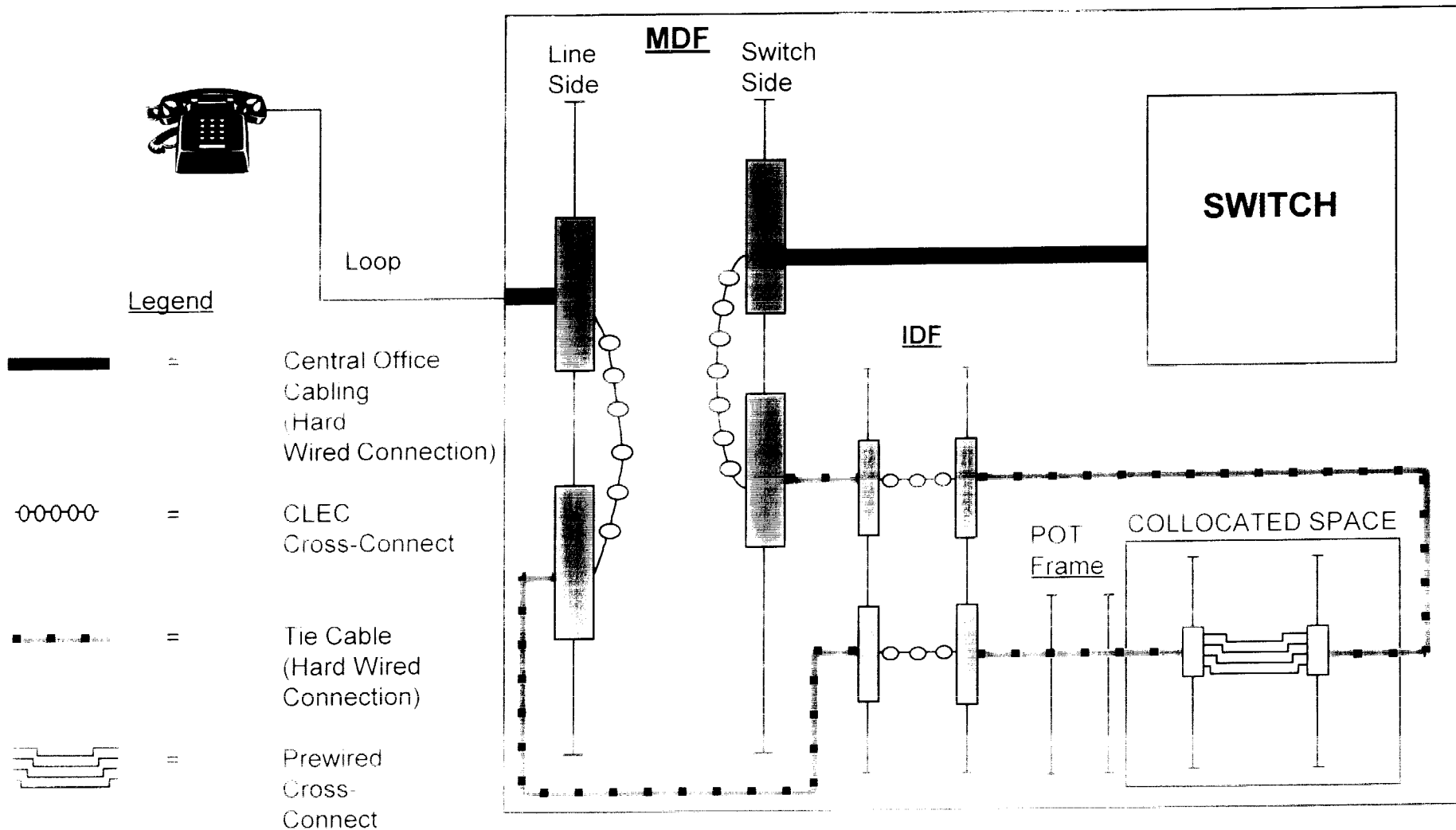
# **ATTACHMENT 8**

**Figure 4**  
**Basic Collocation Arrangements**  
**For Reconfiguring Network Elements**



# **ATTACHMENT 9**

**Figure 5**  
**Collocation Configuration For Combining Elements**  
**Where IDF And POT Frames Are Used**



# **ATTACHMENT 10**

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

----- X  
:  
Petition of New York Telephone Company :  
for Approval of its Statement of Generally :  
Available Terms and Conditions Pursuant to :  
Section 252 of the Telecommunications Act :  
of 1996 and Draft Filing of Petition for :  
InterLATA Entry Pursuant to Section 271 of :  
the Telecommunications Act of 1996 to :  
Provide In-Region, InterLATA Services in :  
the State of New York :  
+  
+  
+  
----- X

Case 97-C-0271

**AFFIDAVIT OF KAREN MAGUIRE ON BEHALF OF**  
**BELL ATLANTIC - NEW YORK**

STATE OF NEW YORK     )  
                                  )  
COUNTY OF NEW YORK    )

ss:

Karen Maguire, being duly sworn upon oath, deposes and states as follows:

1. My name is Karen Maguire. My business address is 375 Pearl Street, 15th Floor, New York, NY 10038. I am the Director of Project Management - Large Customer Networks for Bell Atlantic. My responsibilities include the implementation of collocation in New York State.
2. I received my Bachelor of Science in Electrical Engineering degree from Manhattan College and my Masters of Business Administration degree from the University of Pennsylvania

engineering organizations. Together, the Wholesale Markets and Engineering teams will ensure the streamlining of the collocation process in order to meet the customers' requested due dates. In addition, a Collocation Core Team, which consists of representatives from many BA-NY organizations (including product management, process reengineering, methods, systems, regulatory, and the implementation teams discussed above) meets regularly to review the progress of open issues and resolve problems. These teams support both physical and virtual collocation.

19. Nevertheless, there are limits on BA-NY's capacity to provide physical and virtual collocation arrangements on demand. One constraining factor for both BA-NY and the collocators is the availability of technically-proficient, qualified third-party vendors. BA-NY, for example, contracts with equipment vendors for cage material, power equipment, cable, cable racks, etc. BA-NY also contracts with service vendors for cage construction, power engineering and installation, cable and racking installation, and network transmission equipment engineering and installation. To allow the collocator more control over its intervals, BA-NY will allow the collocator to contract directly with BA-NY - approved vendors to perform engineering and installation of transmission equipment. Similarly, collocators contract with equipment vendors for network transmission equipment, cable, etc., and with service vendors to engineer and install network transmission equipment. There are only a limited number of equipment and service vendors that are qualified for these functions and these resources are being stretched by BA-NY and the collocators due to the significant increase in competitive activity in the New York region. For example, at the present time, there are only two vendors that are qualified and willing to perform central office power engineering and installation. While BA-NY is working to identify

alternative vendors where possible (for example, BA-NY is currently evaluating responses to a Request for Proposal for cage material suppliers and installation), the availability of qualified outside vendors remains a problem that cannot be readily solved by BA-NY alone. Over time, however, I would expect that additional resources would be developed if, in fact, there is a measureable and consistent increase in demand.

20. Over the last year, BA-NY gained an enormous amount of experience in handling collocation requests and constructing collocation cages. In one month, we turned up a peak load of 15 cages. Based on this experience, the significant improvements that we subsequently made to our internal processes, and the augmentation of our work force dedicated to collocation, on a going forward basis with existing resources, BA-NY expects that it will be able to provide approximately 15 to 20 physical and/or virtual collocation arrangements per month across New York State. BA-NY will add resources, as required, to meet the forecasted increase in demand. In order to smooth BA-NY's workload, as well as those of the collocators and outside vendors, if more than 3 applications are submitted on a given day by a single CLEC, or if a CLEC submits more than 8 requests in a single month are for a particular geographic area (the Company's five geographic areas in New York State are Manhattan, other New York City boroughs, Long Island, Midstate and Upstate), the due dates for completion of the requested collocation arrangements will have to be negotiated and staggered. Similarly, if BA-NY receives more than 15 to 20 requests for collocation cage turn up in a given month, each collocator will have to prioritize its due dates. BA-NY will attempt to complete some offices in less than the standard interval but the collocator may have to agree to extended intervals for some offices when submitting volume orders. Staggering the due dates should not present a problem for collocators since BA-NY's



experience to date has shown that collocators do not have the resources to accept multiple cages on a single day.

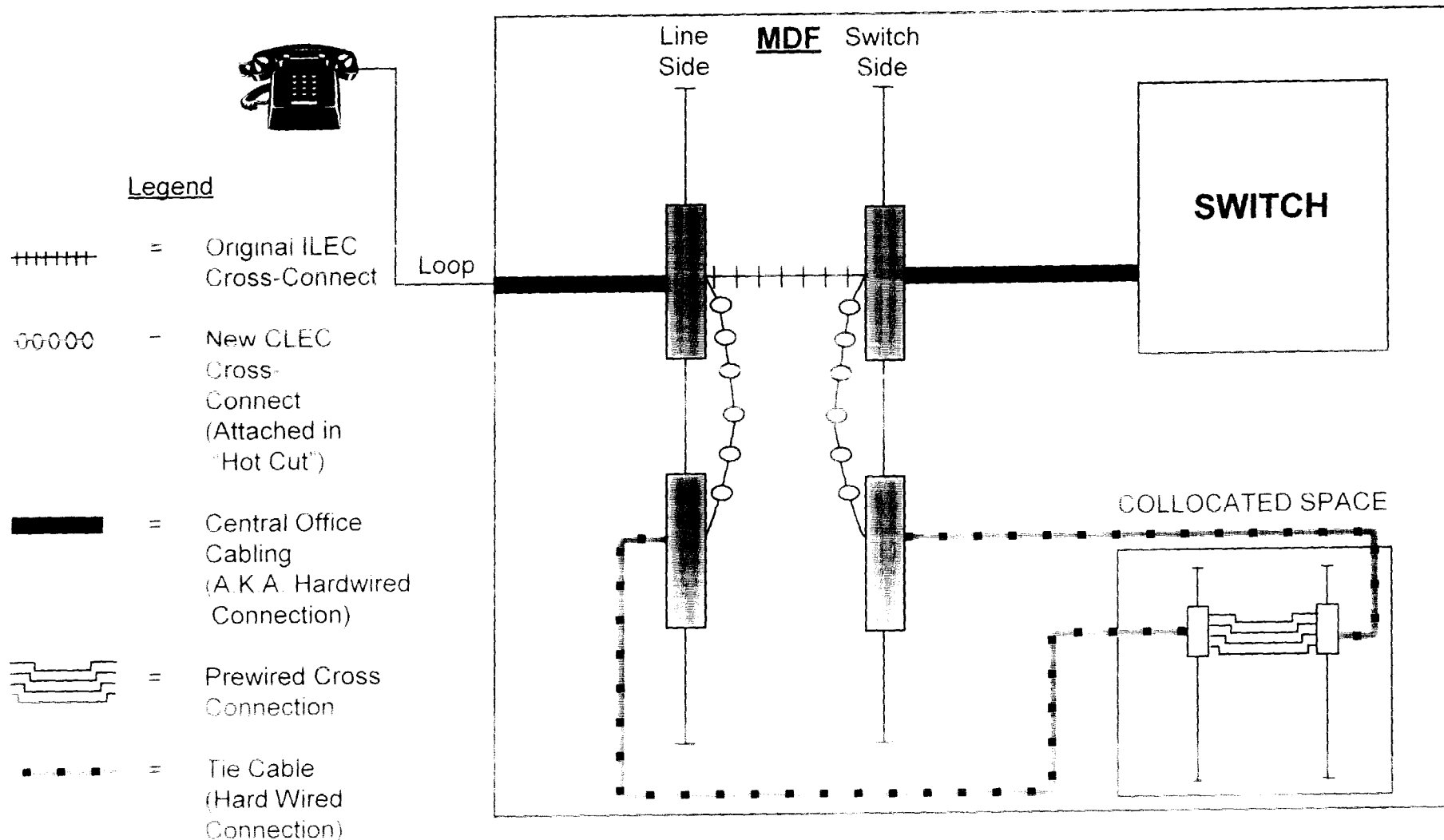
21. In some instances, BA-NY may be able to accommodate greater demand. For example, if multiple carriers select the same central office, it is often more efficient to undertake all jobs at the same time, particularly if the collocation area is new and requires renovation. To advance this goal, BA-NY will solicit the participation of a number of collocators that have expressed interest in sites like this. This should enable BA-NY to increase its capacity beyond 15 to 20 collocation arrangements per month.

22. In the event 1998 demand exceeds BA-NY's current capacity for providing physical/virtual collocation arrangements, BA-NY will supplement its work force and attempt to add more qualified equipment and service vendors. However, because this cannot be quickly accomplished, it is critical that collocators provide BA-NY with timely forecasts of their demand. Alternatively, collocators can make their own arrangements with BA-NY-approved engineering and installation vendors. This will give them greater control over scheduling and may allow for the provisioning of more than 20 collocation arrangements in a given month. Furthermore, if the collocators control the all outside vendor activities, they can seek to better the standard interval.

23. This concludes my Affidavit.

# **ATTACHMENT 11**

**Figure 6**  
**2 Cross-connects Needed to**  
**Establish a New Customer**  
**("HOT CUT")**



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ALL-STATE LEASE

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544**

<b>In the Matter of</b>	)	
	)	
<b>Application by BellSouth Corporation,</b>	)	<b>CC Docket</b>
<b>BellSouth Telecommunications, Inc.,</b>	)	<b>No. 97-231</b>
<b>And BellSouth Long Distance, Inc. for</b>	)	
<b>Provision of In-region, InterLATA</b>	)	
<b>Services in Louisiana</b>	)	

**AFFIDAVIT**

**OF**

**JORDAN RODERICK**

**ON BEHALF OF**

**AT&T CORP.**

**AT&T EXHIBIT F**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Application by BellSouth Corporation,</b>	)	<b>CC Docket</b>
<b>BellSouth Telecommunications, Inc., and</b>	)	<b>No. 97-231</b>
<b>BellSouth Long Distance, Inc. for</b>	)	
<b>Provision of In-region, InterLATA</b>	)	
<b>Services in Louisiana</b>	)	

**AFFIDAVIT  
OF  
JORDAN RODERICK  
ON BEHALF OF AT&T CORP.**

**Introduction**

1. My name is Jordan Roderick. My business address is 5000 Carillon Point, Kirkland, Washington 98033. I am executive vice president, national operations, at AT&T Wireless Services, Inc. In that capacity, I have overall responsibility for national sales, marketing, information systems and customer care operations.
  
2. AT&T Wireless offers wireless services using both cellular and PCS licenses around the country. In my position, I have become intimately familiar with the characteristics of both cellular and PCS communications systems, as well as with the substitutability in the marketplace of those wireless products for customers' current wireline local service.

**FCC DOCKET CC NO. 97-231**  
**AFFIDAVIT OF JORDAN RODERICK**

3. The purpose of my affidavit is to establish (1) that as currently offered, there is no difference, from the perspective of the end user, between digital "cellular" and "PCS" service, and that (2) this is because there is no difference between the transmission and network protocols, the network architecture, and the outward appearance of handsets, deployed in the PCS and cellular systems today. PCS today is simply a cellular offering broadcast on a different part of the spectrum.

**Characteristics of Cellular and PCS Service**

4. As these products are currently offered in the marketplace today, there is no difference at all from the perspective of the end user between service marketed under the name "PCS" and service marketed under the name "digital cellular." Each of these services provide the user with exactly the same package of features and functionalities, including mobility, capability for high-speed handoff, paging and the full panoply of vertical features such as call waiting.

5. The functional equivalence of PCS and digital cellular service is vividly demonstrated by AT&T's own marketing experience. AT&T Wireless provides digital services around the country, using either cellular or PCS frequencies, depending on the particular geographic location. In order to avoid needlessly confusing consumers, those services are marketed under the combined name "Digital PCS," regardless of the actual frequency used for transmission. Indeed, AT&T Wireless customers use dual-band phones that are capable of

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**AFFIDAVIT OF JORDAN RODERICK**

receiving and transmitting over both "cellular" and "PCS" frequencies. Thus, as an AT&T consumer travels around the country using his or her wireless phone, the consumer would have no way of knowing whether any particular call is being transmitted between the phone and the wireless network over the cellular or PCS frequency -- nor would the customer have any reason to care, as the quality of transmission and the features and functions available to the consumer would in no way depend on the frequency being utilized. As discussed above, PCS as deployed today is simply cellular service transmitted over a different part of the spectrum.

6. This seamless dual-band operation is achieved by deploying the same technology in both bands. AT&T Wireless' national signaling system operates without regard to radio frequencies. New customers in both cellular and PCS systems will utilize identical ACELP voice coders; both PCS and cellular systems utilize the same software within the switch. The only difference between cellular and PCS communication occurs at the base stations which broadcast on different frequencies depending on whether AT&T has a cellular or PCS license in the market in question.

7. In short, there is no material difference today between cellular and PCS service.



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**AFFIDAVIT OF JORDAN RODERICK**

**Substitutability of PCS for Wireline Local Service**

8. Although PCS and cellular services are thus substitute products that compete against each other in the marketplace, PCS today is not a substitute, and is not a viable competitive alternative for wireline local services. This is so because PCS is inherently more costly than wireline service and has limitations that make it unsuitable for many households as a potential replacement for wireline service.

9. The PCS systems that are currently deployed have been designed and built to accommodate the needs of mobile individuals who would expect to use their wireless phones to talk while driving at high speed, with small, low-powered handsets. The equipment and technology needed to provide that type of mobility and high-speed hand-off means that PCS service will necessarily be more costly to provide than wireline local service for the average wireline user. Thus, PCS service as it is now offered will not be priced in a way that would make it attractive for those consumers seeking basic local exchange service and who do not value mobility.

10. Moreover, although wireless service has made tremendous improvements in recent years in terms of quality and reliability, certain features of wireless service would make it unattractive to many consumers as a replacement for their existing wireline service. Its very mobility limits the attractiveness of PCS service, for example, for multi-resident households.